

1 A Once payroll --

2 Q -- radio station's bank account?

3 A Yes. Once payroll and some expenses were paid,
4 whatever money was left over, if I'm not mistaken, that is
5 where that came from.

6 Q Okay.

7 A I would have a notation of what it is because
8 anything that has been paid since I am there, because these
9 are documents that had to be prepared that were behind in
10 filing. Once I found that out, I had to bring everything
11 current and that is what I did and I would have a notation
12 of that. I should have a notation of where that is. If it
13 did -- I think I have a receipt from the Bank of Nova Scotia
14 for this.

15 Q The Bank **of** Nova Scotia is that where Family
16 Broadcasting has their checking account?

17 A That's where the checking account is.

18 Q Is there another bank account for Family
19 Broadcasting?

20 A No. That's the only one that I'm aware of.

21 Q Who has authority to write checks on that account
22 currently?

23 A Currently, everything is as it has always been, my
24 father, my mother and I. They need two signatures but I
25 have already told them that once I get everything clear, I

1 wanted to move the account from the Bank of Nova Scotia and
2 open and entirely new account and start everything on an
3 equal footing

4 Q By everything clear, do you mean this proceeding?
5 Are you making reference to this proceeding?

6 A Yes, I am. And eliminate my father's signature.

7 Q Would you maintain two signatures on the account
8 at that time?

9 A Yes, I would.

10 Q Who would the other signature be?

11 A I would have one of my brothers and the only other
12 one who's in St. Croix is my brother, Gerard.

13 Q Currently, all checks require two signatures.
14 Does that include payroll? Does that include bills that are
15 paid?

16 A If we pay by check?

17 Q Yes.

18 A It's two signatures.

19 Q How else do you pay payroll and bills?

20 A Well, whatever is deposited. Many times, if we
21 don't have any checks left, then my father would just -- he
22 used to just withdraw the money from the account and then
23 we'd purchase the cashier's check.

24 Q Okay. **So** withdrawals can be made on one signature
25 but checks can only be written on two signatures. Is that

1 correct?

2 A A withdrawal can be made. No, I think it does
3 require two signatures also.

4 Q Okay. So, even if you were going to get a bank
5 check, you would have to have two --

6 (Multiple voices.)

7 A In order to get the money --

8 Q -- people to sign also?

9 A -- in order to get the money out of the bank

10 Q Okay. **So**, currently, if you're not on the island
11 and a bill needs to be paid how is that accomplished?

12 A Well, while I'm here, I could use this as an
13 example.

14 Q Okay.

15 A Any mail that comes in, since I departed on Monday
16 morning, my mother's holding all of the mail for me. When I
17 get back, then I will take care of all of that.

18 Q Is she going **to** the radio station and picking up
19 the mail or --

20 A No. I have my cousin picking up whatever mail is
21 there and checking the post office box and giving everything
22 to my mother, so she's the one holding everything for me.

23 Q Is this your cousin, Neville James, who --

24 A No. This is Vernon --

25 Q Vernon.

1 A -- Vernon James.

2 Q Okay. You had mentioned at your last deposition
3 that it would cost approximately \$20,000 to \$25,000 to bring
4 the FM stations into compliance with FCC regulations; and I
5 think you estimated \$10,000 to \$13,000 for the AM. Do you
6 know if those estimates are currently correct or are there
7 updated figures?

8 A Based on the information that I received and that
9 was from the engineer that was working with me, Mr. Herb
10 Schoenbohm.

11 Q This was at what time period?

12 A This is the last time I was there and I have some
13 updated information and the price has not changed.

14 Q Okay. Have any of those expenses been incurred
15 since the time of your last deposition?

16 A No, not currently.

17 Q You had mentioned that it's your practice to go to
18 the radio station every day. Is that correct?

19 A Yes, it is.

20 Q That's how many days a week?

21 A I visit the radio station seven days a week.

22 Q Okay.

23 A When I'm there on the weekends, I'm usually there
24 most of Saturday, all day Saturday. And Sundays, it's just
25 for a couple of hours.

1 Q You also mentioned that your son is ill and he
2 requires care from time to time?

3 A Yes.

4 Q Does that keep you away from the office?

5 A Not all of the time. My mother has been helping
6 me with him. She's retired and she --

7 Q How often do you think it keeps you away from the
8 office?

9 A If it keeps me away, it will only be maybe a
10 matter of hours during the day. But, you know, I'm up at
11 the radio station until late at night.

12 Q Has your son required hospitalization during the
13 time that you've been -- since you've been named President?

14 A When I came up for my last deposition, he was
15 hospitalized that same week.

16 Q In 2001, May 2001?

17 A Yes, he was.

18 Q Here in Washington, D.C.?

19 A No, at home.

20 Q In St. Croix?

21 A He was in St. Croix.

22 Q How long was he in the hospital?

23 A I think about one to two weeks.

24 Q Were you back at the island at the time?

25 A I was here but I communicated with them every day.

1 Q Okay.

2 A Several times a day.

3 Q Has he been hospitalized for any other period of
4 time since then?

5 A That day, no, he wasn't kept there but we've been
6 to the emergency room several times. He's under the
7 doctor's care.

8 Q What is the nature --
9 (Multiple voices.)

10 A He's severely asthmatic and he has hypertension
11 and he's been on medication for hypertension since the age
12 of ten.

13 Q Since I think it's March 2001 that you became
14 President. Is that correct?

15 A Yes.

16 Q How often have you been off the island since that
17 time, March 2001 to the present?

18 A Since March 2001, I have only been off when I came
19 **up** for the deposition. I returned in May. I was here from
20 May until the end of August. My children came up in August
21 and they spent the entire month of August here with me. I
22 went back and then I came back up in September

23 Q **You** came back up to the D.C. area --

24 A To D.C., yes, I did.

25 Q -- in September? From September 2001 until when

1 were you here?

2 A I was here for approximately one to two weeks in
3 the month of September.

4 Q Okay.

5 A Last year, I didn't leave the island last year. I
6 was at home all last year.

7 Q All of 2002?

8 A Yes.

9 Q Did you take any vacation from your
10 responsibilities at Family Broadcasting, during the period
11 of March 2001 to the present?

12 A No. I don't have any vacation. It's a 24-hour
13 job.

14 Q What about any sick leave?

15 A (No response.)

16 Q During the time that you were away from the island
17 in 2001, which I have as May to August 2001 --

18 A Yes.

19 Q -- and then two weeks in September 2001, did you
20 communicate with the radio station about management issues?

21 A Yes, I did on a daily basis.

22 Q Who did you speak to?

23 A Al Clark.

24 Q Did you have those communications by telephone or
25 e-mail or facsimile or cellphone?

1 A Cellphone.

2 Q Okay. Did you talk to anyone else about issues
3 related to the radio station while you were here?

4 A I spoke to Alvin G and that was back in August and
5 I also spoke to Maria "Chi Chi" Heywood.

6 Q What was that about?

7 A They were the other two persons that I called
8 because I got a message from my mother that, you know, they
9 were calling. I was calling and I communicated with Al on a
10 daily basis. Evidently, the information that he was giving
11 them, they didn't -- they either didn't believe or the
12 information that Mr. Encarnacion was calling and giving them
13 I guess maybe they took more credence in what he said than
14 what I said. **So** when I called and I explained everything to
15 them because they said they were hearing conflicting
16 information.

17 Q What subject was the conflicting information
18 related to?

19 A It was about the radio station. That the radio
20 station was sold; that the FCC took the radio station from
21 me; that they no longer have a job; that Mr. Encarnacion
22 bought the station and that he is now the manager; and
23 they're going to be working for him and he's getting rid of
24 some of them.

25 Of course, hearing things like that -- I am

1 calling telling them one thing and then they're hearing all
2 of these other rumors from him. He's calling from Florida
3 telling them these stories and there were people locally
4 telling them that the station is going to shut down, or: You
5 have lost the station already. You'd better look for a job.
6 It was sending conflicting information.

7 So I decided and I took it upon myself when I
8 found out there was some people who had questions because
9 evidently what I explained to Al was not being disseminated
10 the way I explained it to him. So I took it upon myself,
11 whenever I was told someone had questions or they weren't
12 too sure or they felt uneasy, I personally called them.

13 As a matter of fact, I spoke to Alvin G for one
14 hour-and-a-half on my phone, explaining from A to Z what I
15 had been through since I came up here until the day I was
16 speaking to him.

17 I spoke to Chi Chi for approximately half-an-hour
18 to 45 minutes and I explained to her. **You** know, they were
19 satisfied after I spoke with them and I told them I said:
20 That is why I was calling Al giving him a daily run-down **of**
21 what had happened thus far. If nothing happened on that
22 particular day, then there was nothing for me to report.
23 But some of them felt that something should have been
24 happening every day and I explained to them that is not the
25 procedure.

1 When you're working on motions and when you're
2 working on completing documents, nothing changes at that
3 particular time. But they felt, based on what they were
4 being told, they're hearing one thing in one ear and
5 something else in the other. And they just wanted to know
6 what the truth was. So when I called, I explained it to
7 them and they were satisfied.

8 Q So this period **of** May to August 2001, when you
9 were here, you were here because you were working on matters
10 related to --

11 (Multiple voices.)

12 A Yes, I was.

13 Q -- this issue?

14 A Yes.

15 Q In your absence, during the period **of** time you
16 identified, who was handling your duties on a day-to-day
17 basis in the station?

18 A Well, Alvin G, who is sort **of** the News Director
19 was also at the time he had the position of Station Manager,
20 so both he and Al Clark. If they had any questions, they
21 had my cellphone number to call me. If they couldn't get
22 me, they would call my mother and my mother would try and
23 get in touch with me. But, in any event, we communicated on
24 a daily basis.

25 Q Okay. What about while you're here at the

1 deposition this week? Who is handling --

2 A Al Clark.

3 Q Have you spoken to him, since you came up for your
4 deposition this week?

5 A Yes. I called and I let him know, well, you know,
6 I got up safely. I go for the deposition on Wednesday; and,
7 once I leave the deposition, like I did in May, as my
8 husband picked me up at the front door, as I got in the car,
9 the first thing I did was dial the radio station. I spoke
10 to him for at least an hour and I explained what had
11 occurred that day and I intend to do the same thing this
12 afternoon or this evening.

13 Q What if something drastic were to happen at the
14 radio station while you were traveling? Who would handle
15 that issue?

16 A Well, I informed them that they're supposed to
17 call my mother. I feel comfortable with my mother handling
18 it in my absence.

19 Q How do you know your father isn't at the radio
20 station when you're not --

21 A Trust me, I know. If he were there, my phone
22 would ring.

23 Q Who would call you?

24 A Al Clark and my cousin, Vernon James. I have him
25 there standing by.

1 Q He's at the station in your absence?

2 A Yes. According to him, he was suffering from what
3 is it when you feel boxed in?

4 Q Claustrophobic?

5 A You have a fever and - -

6 Q Cabin fever.

7 A Yes, cabin fever. So he goes to the radio station
8 and he sits there and he assists, you know, whenever he can
9 or wherever he can. He answers the telephone instead of
10 just sitting at home. He's on disability and instead of
11 sitting at home, as long as his back is feeling fine, he
12 goes there and he sits all day and answers the phone and
13 assists anyone that needs it. I've even shown him how to do
14 a little bit of production because I believe in teaching
15 people what I know.

16 Q A question that I didn't ask you at the time of
17 your deposition is: Do you get any salary for your work with
18 the radio station currently?

19 A No, I don't.

20 Q Have you ever gotten any salary for your work with
21 the radio station?

22 A No, I have not.

23 Q Do you have any benefits that Family Broadcasting
24 paid for?

25 A (No response.)

1 MR. COLBY: The witness is shaking her head.

2 THE WITNESS: No. I'm sorry.

3 BY MS. DeNIGRO:

4 Q The witness is shaking her head.

5 A I'm sorry. No.

6 Q I'm sorry. Yes.

7 A I'm sorry. No. No, I do not.

8 Q All answers must be verbal.

9 A Yes. I'm sorry.

10 Q Do you or your children currently have any health
11 insurance?

12 A I had health insurance up until May --

13 Q Until May.

14 A -- of this year.

15 Q Of 2002.

16 A Yes.

17 Q Your children as well?

18 A Yes. But we currently do not. I'm trying to find
19 some other health insurance because it was costing for my
20 husband, three children and myself \$458 a month.

21 Q Who was paying the premiums on that?

22 A My husband.

23 Q He was paying 100 percent of that cost?

24 A Yes.

25 Q Since you have a sick child who requires medical

1 treatment, who's been paying for the medical treatment since
2 the insurance ceased in May 2002?

3 A Well, luckily, I have not had to take him. Since
4 May, he has only been to the hospital I think it's two or
5 three times. When he goes to the doctor, I just have to pay
6 a regular doctor visit.

7 Q So you personally paid that?

8 A Yes.

9 Q When I say you, I mean --

10 (Multiple voices.)

11 A My husband and I.

12 Q Okay.

13 A Yes.

14 Q He has regular medication --

15 A Yes, he does.

16 Q -- I would assume then as well. Who pays for
17 that?

18 A If I don't pay for that, then there are times when
19 my mother will pay for it. My mother **has** taken him on like
20 another son and not a grandchild.

21 Q How often does she pay for things related to his
22 health care?

23 A The last time she did was I think either in
24 November and that was for a prescription, to refill a
25 prescription. It needed refilling. Before I could get to

1 it, she got to it and she had it filled. I asked if she
2 wanted to be reimbursed and she said: No. That's my
3 grandchild.

4 Q Is your mother taking care of your children while
5 you're at the deposition here this week?

6 A Yes, she is.

7 Q Did she take care of the children when you
8 traveled in 2001, the identified periods of time before?

9 A Yes, she did.

10 Q Is she compensated in any way for --

11 A No. My parents, you know, they take care of the
12 grandchildren because those are their grandchildren and they
13 don't look for any kind of compensation. They do it out of
14 love.

15 Q You have a daughter in college, correct?

16 A Yes, I do.

17 Q She is in Louisiana. Is that right?

18 A Yes, she is

19 Q Okay. Who pays the expenses related to her
20 tuition and schooling?

21 A She has a scholarship and she has gotten a loan.
22 And whatever my husband and I have not paid, my mother again
23 has stepped in and offered to help and she has, you know,
24 paid for her sometimes. Well, assisted with the tuition
25 payments when her loan checks were late or until the

1 scholarship went through.

2 Q Okay.

3 A But my daughter has always sought financial aid
4 and we've always helped where we could.

5 Q You also have children in private school in the
6 Virgin Islands. Is that right? Complex was the --

7 (Multiple voices.)

8 A No.

9 Q -- name of it?

10 A That's a public school. St. Croix --

11 Q A public school, okay.

12 A -- Educational Complex.

13 Q Okay. There's no cost related to --

14 A No.

15 Q Okay. Other than your mother's retirement checks
16 and your father's retirement checks, what assets do your
17 parents have?

18 A To the best of my knowledge, the home that they're
19 residing, which is No. 83 Estate Anna's Hope. They also own
20 No. 82 Estate Anna's Hope, which **is** right next door, and
21 there's some property in Estate Catherine's Rest. I don't
22 know the exact numbers.

23 Q Anything else?

24 A My mother takes care of my aunt's property, which
25 was her sister. That is in my mother and my other aunt's

1 names. That they're turning over to my aunt's daughter
2 because my grandmother and my aunt raised her. My mother
3 doesn't want any interest in that and they're turning that
4 over to my cousin.

5 Q Okay. Do you know what the value of the
6 properties that you identified, the two properties in Anna's
7 Hope is?

8 A I have no idea.

9 Q What about the Catherine's Rest property that you
10 identified?

11 A I have no idea what the values are.

12 Q Are you aware of an interest that your parents
13 owned in Western Suburb in Christiansted?

14 A That would be my father. If I'm not mistaken, I
15 think that was either my grandfather's or an aunt of my
16 father's. It's a family member of my father's and that's
17 how I think my father got an interest but that's all I know
18 about it.

19 Q Do you know what the value is?

20 A I have no idea what it is.

21 Q Do you know if it's a developed property?

22 A I have no idea.

23 Q Do you know if there's an income-producing
24 property in Catherine's Rest that your parents have an
25 interest in?

1 A I know there's a small apartment that is there but
2 I don't know what the -- I know the tenant pays rent. I
3 have no idea how much she pays though. She's been living
4 there for years as far as I know. Even before I moved home,
5 she's been there.

6 Q Do your parents have property interest in a
7 location called La Grande Princess?

8 A That's where my father's office is and I think
9 that is the property that is in litigation right now.

10 Q What do you know about that litigation?

11 A All I know is that my father used it as security
12 for a loan from the bank and there was some dispute. A lot
13 of this, he kept private away from me, **so** I have no idea.
14 I've asked questions about it but he only tells you what he
15 wants you to know.

16 Q Do you know --
17 (Multiple voices.)

18 A I have no idea what the situation is with that.

19 Q Do you know what specific property in La Grande
20 Princess is subject to this litigation?

21 A No, I don't.

22 Q When did the litigation begin? Are you aware of
23 that?

24 A I have no idea.

25 Q Okay. Do you know if the litigation involves debt

1 that's owed by Family Broadcasting?

2 A I think it does. I think my father used the
3 property as security for the loan that he used to purchase
4 the station, if I'm not mistaken. I could be wrong.

5 Q Do you know if Family Broadcasting owns --
6 independent of your father. The company owns -- let me
7 rephrase that. Do you know if Family Broadcasting owes
8 money on that debt, as opposed to your father owing money on
9 that debt?

10 A I have no idea.

11 Q Have you ever seen any papers related to this
12 litigation?

13 A I have asked for copies of the papers and I have
14 not gotten it.

15 Q Who did you ask?

16 A My father.

17 Q **All** right. Do you know if copies of filings are
18 available from the court in the Virgin Islands?

19 A No, I don't. They probably are but I wanted to
20 see what documents he had.

21 Q He has not provided you with any documents?

22 A But he has not given them to me.

23 Q Do you have any idea how much the value of the
24 debt that's being addressed in this litigation is?

25 A No, I don't.

1 Q Have you, since you became President of Family
2 Broadcasting, paid any money to the bank with respect to any
3 debt that's involved in litigation?

4 A No, I haven't. I have not received any request
5 for payment or seen any documentation.

6 Q Do you think that the properties that you
7 identified in Anna's Hope and the properties that you
8 identified in Catherine's Rest and the additional property
9 that we've identified in Western Suburb in the Town of
10 Christiansted, do you believe those properties have any
11 value?

12 A Oh, yes.

13 Q Do you think they have significant value?

14 A Yes, they do.

15 Q Do your parents have any other assets other than
16 these properties and the retirement accounts that we've
17 discussed?

18 A I'm not aware **of** any.

19 Q Let me just ask you because we mentioned it
20 before, do they own any race horses?

21 A Not currently.

22 Q Okay. Let's mark as Deposition Exhibit No. --

23 A As 20.

24 Q -- 20. Thank you.

25 //

1 (The document referred to was
2 marked for identification as
3 Deposition Exhibit No. 20.)

4 MS. DeNIGRO:

5 Q I'll ask you to take a **look** at that document and
6 tell me if you've seen it before?

7 A Yes, I have.

8 Q Can you identify it for me?

9 A Yes. This is a declaration signed by me in March
10 2001.

11 Q What was the purpose of the declaration?

12 A The purpose of this declaration was to have me
13 named as President of Family Broadcasting.

14 Q Was the purpose of the declaration to be filed
15 with the FCC?

16 A Yes, it was.

17 Q Okay. I just want to draw your attention to one
18 paragraph of that document and that's number seven at the
19 top of page two. The last sentence: Nevertheless, the
20 station constitutes the only valuable asset held by my
21 father for the benefit of his children and his
22 grandchildren.

23 How do we reconcile that statement with the fact
24 that there are valuable assets in the form of real estate
25 that your parents own?

1 A Okay. When I made this statement, this only
2 referred to the radio station and it did not include the
3 family home.

4 Q Or the real estate that we've identified?

5 A No, I did not.

6 Q Okay. So that statement was only intended to --

7 A This just referred solely to the radio station.

8 Q Okay. So it didn't mean -- you did not intend to
9 state here that your parents had no other valuable assets?

10 A No. That was not the intention of the statement.

11 Q Okay. We can set that aside. Since your last
12 deposition, you haven't changed your home address. Is that
13 correct? You're still living in --

14 (Multiple voices.)

15 A I'm still there at home.

16 Q -- 83 Anna's Hope --

17 A Yes.

18 Q -- and your parents live there? Does anyone else
19 live in the house currently?

20 A My parents, myself, my two children and my parents
21 now are taking care of a niece, Shanel James, S-H-A-N-E-L,
22 my brother, Emmeth's, daughter.

23 Q How old is she?

24 A She just made 17 last month. She's 17 years of
25 age.

1 Q Do you contribute anything to the household
2 expenses at that address?

3 A No, I don't. My parents, even if I were to offer
4 them anything, they wouldn't take it.

5 Q This includes food for yourself and your children?

6 A No. My parents take care of that for the
7 children. I usually -- I'm not a big eater. I'm a coffee
8 drinker, so they don't have to worry about food for me.
9 Usually --

10 (Multiple voices.)

11 Q I wish I had that.

12 A -- my children are not the only ones. When my
13 mother cooks, she cooks for all of the grandchildren. **So** on
14 the way home from school, everyone stops by whether they
15 live there or they don't live there and everyone eats and
16 then they go home and their parents have nothing to worry
17 about. That is just how my family is. That's how my
18 parents are. I've tried to get my mother out of that but
19 it's difficult. She wants to do it and it's difficult to
20 get her to stop.

21 Q Do you have any other responsibilities with
22 respect to the upkeep of the house, or does your mother take
23 care of -

24 A No. We --

25 Q -- that as well?

1 A My children and I we all pitch in. We help keep
2 the house clean and, you know, we all do chores around the
3 house as usual.

4 Q Other than the medical expenses that we've already
5 discussed and the schooling expenses that we've already
6 discussed, do your children or you have any other regular
7 expenses, for instance: cellphones, or Internet connections,
8 or cable television bills, or things of that nature?

9 A I have an Internet connection and I pay \$19.96 a
10 month.

11 Q Who pays for that bill?

12 A I do.

13 Q Okay.

14 A This is on a plan with my husband's phone.

15 Q Are there any other expenses that you can think of
16 that we haven't already discussed?

17 A Not off-hand that I can think of.

18 Q Do you ever work on Family Broadcasting matters at
19 home?

20 A Yes, I do.

21 Q How regularly do you work on Family Broadcasting
22 matters at home?

23 A If my son isn't feeling well and I'm at home with
24 him, then I will leave. If he's sick and I'm at the
25 station, I will leave the station and I'll take some work

1 home with me. I have a disk holder that has all of the
2 disks that I'll be working on. I have logs and different
3 things like that.

4 Q So you keep a computer at home that you can work
5 on?

6 A I have a computer at home.

7 Q Do you keep documents at home that you work with
8 as well?

9 A Yes.

10 Q About how often is your son sick that you do this?
11 With what sort of regularity do you work at home as opposed
12 to working at the office?

13 A It's not very often because I'm at the station
14 every day but it could be maybe just for a couple of hours
15 unless I am not feeling well. If I'm not feeling well, then
16 I will be at home and I'll just work from home. I always
17 notify the station that I won't be in until later. So if
18 anything comes up, give me a call; and when I'm feeling
19 better, I'll get up. I'm on the computer and doing whatever
20 paperwork I have to do.

21 Q When you're working from home, do you discuss what
22 you're working on with your family?

23 A No. No, I don't.

24 Q Do you maintain files at home for Family
25 Broadcasting?

1 A I have whatever files I'm working on. I have a
2 filing cabinet that I keep those documents in there. I have
3 the payroll files that I work on.

4 Q Where is that file and cabinet located in the
5 house?

6 A Those are right beside my computer.

7 Q Where's the computer located in the house?

8 A I've taken over a portion of the dining room and
9 I've taken over a portion of the living room. So my
10 children have a computer in the living room and I have file
11 boxes there also with the payroll records, copies of
12 receipts, you know, whatever I file.

13 I keep most of the accounts payable and things
14 like that I keep at home. Because it's easily accessible if
15 I get up during the night and I feel like doing some work.
16 It's right there and I don't have to go all the way to the
17 radio station.

18 Q How do you keep your father from interfering with
19 the work that you're doing on Family Broadcasting when you
20 work from home?

21 A He doesn't touch any of my stuff at all. My files
22 and my computer everything is private plus his computer
23 knowledge is limited. So he's still in WordPerfect 5.1 for
24 DOS. That's what he has on his computer at his office, so
25 he has no idea how to even get into my computer.

1 Q How often is your father at his law office? How
2 often does he go to work?

3 A Every day.

4 Q Is he there all day every day?

5 A He's there all day from approximately 8:00 or 8:30
6 in the morning and he comes home anywhere between 5:30 and
7 7:30 in the evening.

8 Q How do you get around the island when you're at
9 home? Do you have a car?

10 A Well, I have a car and the car was not working for
11 a while and it's working now. It was just repaired.

12 Q How long was it not working for?

13 A For approximately a year. I was involved in an
14 accident. Can I elaborate on that?

15 Q Yes. If it's relevant you may elaborate on that.

16 A Well, it's not relative to this but it's just an
17 explanation of what I've been enduring since all of this.

18 Q Okay. You were in an accident when?

19 A I left here in September and my daughter, Leah,
20 who is now 16 years of age, she's a senior in high school.
21 She plays volley ball and whenever my children are involved
22 in sports, I'm there. I'm the head cheerleader. I was
23 taking her home from a tournament one evening, a Sunday
24 evening, and I offered a young man who was standing there
25 without a ride a ride and little did I know that there were

1 some people there who were after him. To make a long story
2 short, I have a bullet hole in the back of my car.

3 Q Dear me!

4 A They were firing shots at the car and they tried
5 to box me in to get at this young man. Two weeks before
6 this incident, they came after this young man at another
7 volley ball tournament and the police had to be called. He
8 filed a police report and they did absolutely nothing. Had
9 they done something, I wouldn't have been in the position I
10 was in.

11 The car ended up going over an embankment and it
12 was drivable until it caught on fire two days later. We
13 filed police reports and my daughter, Leah, has a scar under
14 her left eye because she hit her face. She's my mother's
15 complexion and she hit her face and naturally it left a scar
16 and almost hit her eye out. I ended up going to go and it
17 was very difficult to get the young man, who I gave the ride
18 to who happens to know my niece and my daughter because they
19 all went to school together, elementary school. It was
20 difficult to get him to testify what had happened and what
21 led up to that situation.

22 I personally had to get on the Attorney General's
23 case in order to make them find this young man. I told them
24 where his mother worked and I told them where he was working
25 at Hess Oil Virgin Islands Corporation. I literally had to

1 do the work for them, in order to get them to have this
2 young man arrested and prosecuted.

3 Q Were you involved in the case in a formal way?
4 Were you called as a witness?

5 A Yes, I was. My daughter and I were called as
6 witnesses. Everyone that was in the car, there were five of
7 us. It's a little Mitsubishi Mirage.

8 Q Is that the only time you've ever been called as a
9 witness in a court case?

10 A Yes, it is. It was a traumatic experience not
11 just for me but for my daughter although we have been
12 through so much. When we got to the police station that
13 night, I used the same cellphone to dial 911 while racing up
14 the highway with two cars behind me firing shots. At first,
15 they tried to box me in and I swerved around and I said:
16 Well, you know, what craziness is this? I had no idea what
17 was happening.

18 Then when the one car pulled up along side the
19 glass window and I saw an arm come out like this that's when
20 I shouted and told them: Get down. Put your heads down.
21 This was October 21, 2001. I'll never forget that date. Got
22 to the police and called the dispatcher. Thank God I got
23 through on his phone because usually when you dial on
24 cellphone in St. Croix, you get St. Thomas.

25 But I was fortunate. I dialed 911 and I got

1 headquarters in St. Croix and I told them: I need police
2 assistance. Someone is chasing me. I have a car with kids
3 who are coming from a volley ball tournament. This was
4 around 8:30 in the evening and it was dark outside and I
5 said: They're firing, you know, shots at us and I have no
6 idea why. I haven't troubled anyone and my daughter hasn't
7 troubled anyone. I've given my daughter's teammate a ride
8 home. Her mother had asked me if I could give her a ride
9 home. Fine, I said. I need police assistance and I need it
10 now.

11 Suffice it to say, I got almost to the police
12 station before the police came. We had already gone over
13 the embankment. The brakes locked and the steering wheel
14 locked. So when I tried to turn to go down the street
15 towards the police department headquarters, they bumped me
16 and that's because I had slowed down and I went over an
17 embankment. We landed and skidded a while and then I told
18 them to get out and run, which they did. Then I saw the
19 police coming, so my daughter went out and flagged them
20 down. She's brave.

21 When we got to the police station, I called my
22 brother and he called the Police Commissioner. I told him I
23 said: Had your people done their work two weeks ago, I
24 wouldn't have been in this position. But the young man is in
25 jail and he's serving seven years. The other people in the

1 car in the other car, those who were in the car with him, he
2 refused to name. **So**, you know, every time I'm driving, I
3 have no idea whether someone is -- I know I didn't trouble
4 anyone but I don't know who's out there to trouble me or my
5 children and that's the kind of pressure that I have been
6 under since October 21st.

7 It's not easy. After the trial and everything
8 when he was being sentenced, I asked the Judge to make a
9 statement and I made a statement. I spoke to him and I
10 spoke to his mother. It so happens that his sister goes to
11 school with my daughter and they're friends. His sister
12 told one of the classmates she knew that her brother was
13 looking for this young man. But if she knew that he had
14 gotten in Ms. Petersen's car, she wouldn't have told her
15 brother to come, you know, come to the gym.

16 There's no need for all of this but I told the
17 Judge I said: These kids today emulate what they see on TV.
18 But they fail to realize that those are actors and they get
19 paid for what they're doing. When they are through, they
20 get up and wash the fake blood off and they go home with a
21 big bankroll. These guys ended up in jail. We are losing a
22 generation.

23 I spoke for about half an hour and, eventually I
24 told the Judge, I said: Well, I guess I'd better stop now
25 because I'll keep you here all day.

1 But it was really something. I have never -- you
2 see it on TV. But until you actually experience it and up
3 to this day -- last week, I saw one of the police officers
4 involved in the case and he said: Ms. Petersen, how are you?
5 I said: Fine. He said: How's my girl, Leah? Leah is fine.
6 She's tough.

7 He said: I'm still surprised that night at
8 headquarters none of you were nervous and you weren't upset.
9 I said: Because we didn't trouble anyone.

10 It took one year and I had to have the entire
11 electrical system in the car fixed. It took a year for them
12 to get the correct part first of all because we live in the
13 Virgin Islands and you can't -- they never do anything
14 right. I'll be the first to tell you. My brother in New
15 York went to get the harness and have it, you know, sent but
16 --

17 Q So it took you a year to get the car up and
18 running again after this experience?

19 A Up and running.

20 Q The car is now up and running?

21 A Yes, it is.

22 Q During the period of time that you didn't have
23 access to your car, how did you get around?

24 A That's where my cousin came in, Vernon James,
25 because he said: I will take you around in the event anyone

1 tries to, you know, accost you or Leah I'm here.

2 Q Is that how you got back and forth from the radio
3 station during --

4 (Multiple voices.)

5 A Yes.

6 Q -- that period of time?

7 A Because he came up and he would, you know, give me
8 a hand and he will take me home and I said: Well, my
9 mother's car is there. She's at home all day. She doesn't
10 go anywhere unless she's going to the grocery store. I
11 could use her car. He said: No, no, no. I'm going to take
12 you all around. So, you know, that's what he did.

13 Q So any time you needed to go anywhere, he'd come
14 and get you?

15 A Yes. We're a very close-knit family

16 Q You said your mother has a car as well. The car
17 that we're talking about though is in your name?

18 A It's in my mother's name but I pay the insurance
19 on it.

20 Q Okay. It's in your mother's name and you pay the
21 insurance on it.

22 A Yes.

23 Q Okay. Who makes the decision about the management
24 of the household that you live in?

25 A That's my mother.

1 Q Your mother?

2 A Yes.

3 Q Are there ever any disagreements between you and
4 your mother about issues related to the management of the
5 household?

6 A No. We're like sisters.

7 Q Currently, do you discuss the work at Family
8 Broadcasting that you're doing with your mother?

9 A Well, I let her know what has happened at the
10 station during the days. Things went well, or this broke
11 down and I have to have it repaired. Things like that but
12 that's about the extent of it. She usually doesn't ask me
13 anything about it.

14 Q What about with your father?

15 A No. I have absolutely nothing to say to him about
16 Family Broadcasting.

17 Q Does he ask you?

18 A No. He has learned not to ask me.

19 Q What do you tell him when he does ask you, or when
20 he did ask you before he learned?

21 A None of your business. No disrespect meant
22 though. I'm doing just fine. I'm struggling but I'm doing
23 fine.

24 Q Okay. I want to take just a quick five or ten
25 minute break to see where we are.

1 A Okay.

2 MS. DeNIGRO: We can go off the record for now.

3 (Whereupon, a short recess was taken.)

4 BY MS. DeNIGRO:

5 Q I just want to clarify just a couple of quick
6 things and I'll be ready to wrap up. You had spoken of a
7 trade-off that you did for the computers that we discussed,
8 correct?

9 A Yes.

10 Q Was there a written contract that went along with
11 that trade of advertising time for equipment?

12 A Yes.

13 Q Could you provide us with a copy of that as well?

14 A Yes.

15 Q You can add that to your list of things to send.

16 A Okay.

17 Q Thank you. We also discussed that there was
18 recently a political season down in the Virgin Islands where
19 some advertising was run on the stations.

20 A Yes.

21 Q What was the advertising rate for the political
22 adds during the season?

23 A For the political adds, they have to get the
24 lowest possible rate for the particular date --

25 (Multiple voices.)

1 Q Is that by law?

2 A -- that's FCC rules and regulations.

3 Q Okay.

4 A I think that was \$10 but I did have some political
5 packages also. But, of course, if someone chose to --

6 (Multiple voices.)

7 Q It's \$10 for what?

8 A I'm sorry. It's \$10 for a 30-second spot.

9 Q Okay.

10 A That was the average, \$10. Of course, it depended
11 on where the spot ran because there are certain programs
12 that cost more. For that particular spot, the individual
13 rate would have been a little higher.

14 Q The programs that are a little bit more are which
15 ones?

16 A Community Digest, the news.

17 Q What are they?

18 (Multiple voices.)

19 A If someone requested specifically the news, the
20 lowest-spot rate for the news is \$11 for a 30-second spot.

21 Q Okay. Why don't you give me a quick run-down of
22 what the rates are for the different shows, \$10 being the
23 lowest and \$11 being for the news in particular. How are
24 the rates assigned?

25 A Community Digest's, a 30-second spot is \$13.